

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
TPC GROUP INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-10493 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	

**SUPPLEMENTAL DECLARATION OF MATTHEW DUNDON IN SUPPORT OF  
APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF TPC GROUP, INC., *ET AL.*  
TO RETAIN AND EMPLOY DUNDON ADVISERS LLC  
AS FINANCIAL ADVISOR *NUNC PRO TUNC* TO JUNE 17, 2022**

I, MATTHEW DUNDON, declare under penalty of perjury as follows:

1. I am a Principal of Dundon Advisers LLC ("Dundon Advisers") and am duly authorized to execute this declaration on behalf of Dundon Advisers. I submit this supplemental declaration (this "Supplemental Declaration") supplementing my declaration (the "Declaration") accompanying the July 18, 2022 application (D.I. 461) (the "Application") for entry of an order authorizing the employment and retention of Dundon Advisers as financial advisor for the Official Committee of Unsecured Creditors (the "Committee") *nunc pro tunc* to June 17, 2022. Unless otherwise stated, I have personal knowledge of the facts stated herein. To the extent any information disclosed herein requires amendment or modification upon Dundon Advisers' completion of further review or as additional party-in-interest information becomes available to it,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

a further supplemental declaration will be submitted to the Court reflecting such amended or modified information.

2. On July 12, 2022, Baker Botts L.L.P., counsel to the Debtors, filed a supplemental declaration identifying additional parties in interest in the Chapter 11 Cases [Docket No. 424], which parties are reflected on “Schedule 1” attached hereto (the “Additional Searched Parties”). Dundon Advisers has no disclosable connection, as disclosable connections are described by the Declaration, to the Additional Searched Parties.

3. On the basis of the above and the Declaration, I continue to believe Dundon Advisers to be a “disinterested person” within the meaning of Bankruptcy Code section 101(14) and otherwise qualified for retention and compensation as financial adviser to the Committee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 28, 2022

/s/ Matthew J. Dundon  
Matthew J. Dundon

**SCHEDULE 1**

**Schedule of Additional Searched Parties<sup>1</sup>**

**Insurance Parties**

ACT (AON MunichRe)  
ACT 9551 (Sompo)  
AIG American International Group, Inc.  
Barbican Insurance Group  
Chaucer Holdings Limited  
Hanover Re  
HDI Global Ins. Co.  
HDI Global Specialty SE  
Helvetia Insurance  
Illinois Union Insurance Co  
Llyod's Syndicate 1036  
Llyod's Syndicate 1084  
Llyod's Syndicate 1301  
Llyod's Syndicate 1306  
Munich Re  
National Union Fire Insurance Company of Pennsylvania  
Pioneer Specialty Insurance Company  
QBE Insurance  
Samsung Fire & Marine Insurance Co., Ltd.  
SCOR SE  
Sompo Holdings, Inc.  
Sompo International  
Starr Surplus Insurance Company  
Starstone Specialty Insurance Company  
Validus Reinsurance Ltd.  
XL Insurance America Inc.

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<sup>1</sup> This list contains only new parties that have not been included in the original Schedule 1 submitted with the filed Application.